1 The Honorable Richard A. Jones 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 10 JONATHAN SANTIAGO ROSARIO, individually and on behalf of all others similarly situated, 11 No. 2:16-cy-01951 RAJ Plaintiff, 12 NOTICE OF SETTLEMENT v. 13 AND [PROPOSED] ORDER STARBUCKS CORPORATION, TERMINATING MOTIONS 14 Defendant. 15 Plaintiff, Jonathan Santiago Rosario, and Defendant, Starbucks Corporation ("the 16 17 Parties") hereby jointly notify this Court of their settlement in principle and request the termination of all pending motions, without prejudice to their reinstatement, and in support 18 19 thereof, state as follows: On the evening of February 12, 2019, the Parties reached an agreement in 20 principle to resolve this matter on a global basis. This resolves all the claims in this matter as 21 22 well as those in a similar matter currently pending in the Northern District of Georgia, Kevin Wills v. Starbucks Corporation, No. 1:17-cv-03654-CAP-CMS. 23 2. In this matter, currently pending are Plaintiff's Motion for Class Certification, 24 Dkt. 59, and Defendant's Motion for Summary Judgment, Dkt. 92. 25 3. The Parties stipulate and agree that the *status quo* should continue with respect to 26 27 the above-referenced motions while they memorialize their agreement and discuss the most NOTICE OF SETTLEMENT AND TERRELL MARSHALL LAW GROUP PLLC [PROPOSED] ORDER TERMINATING MOTIONS 936 North 34th Street, Suite 300 (No. 2:16-cv-01951)

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appropriate avenue for seeking approval of this national settlement either in this Court or in the 1 Northern District of Georgia. 2 WHEREFORE, the Parties respectfully request that this Honorable Court terminate 3 Plaintiff's Motion for Class Certification, Dkt. 59, and Defendant's Motion for Summary 4 5 Judgment, Dkt. 92, without prejudice to their reinstatement, if necessary. Respectfully submitted this 13th day of February, 2019. 6 DAVIS WRIGHT TREMAINE LLP TERRELL MARSHALL LAW 7 **GROUP PLLC** 8 By: /s/ Erika L. Nusser By: /s/ Lauren Rainwater 9 Beth E. Terrell, WSBA #26759 James E. Howard, WSBA #37259 Email: bterrell@terrellmarshall.com Email: jimhoward@dwt.com 10 Erika L. Nusser, WSBA #40854 Lauren Rainwater, WSBA #43625 Email: enusser@terrellmarshall.com Email: laurenrainwater@dwt.com 11 936 North 34th Street, Suite 300 920 Fifth Avenue, Suite 3300 12 Seattle, Washington 98103-8869 Seattle, Washington 98104 Telephone: (206) 816-6603 Telephone: (206) 622-3150 13 Facsimile: (206) 319-5450 Facsimile: (206) 757-7700 14 James A. Francis, Admitted Pro Hac Vice Attorneys for Defendant Email: jfrancis@consumerlawfirm.com 15 John Soumilas, *Admitted Pro Hac Vice* 16 Email: jsoumilas@consumerlawfirm.com Lauren KW Brennan, Admitted Pro Hac Vice 17 Email: lbrennan@consumerlawfirm.com FRANCIS & MAILMAN, P.C. 18 1600 Market Street, 25th Floor 19 Philadelphia, Pennsylvania 19103 Telephone: (215) 735-8600 20 Facsimile: (215) 940-8000 21 Attorneys for Plaintiff 22 23 24 25 26

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1	ORDER		
2	IT IS SO ORDE	ERED.	
3	DATED this	day of	, 2018.
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6			The Honorable Richard A. Jones UNITED STATES DISTRICT JUDGE
7			CIVILD STATES DISTRICT VODGE
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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this 13th day of February, 2019.

/s/Erika L. Nusser

Erika L. Nusser, WSBA #40854